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22 November 2016

VIA REGISTERED MAIL
RB 411 734 122 US
RETURN RECEIPT REQUESTED
Office of Business and Legal Affairs
Blue Mountain Music, Ltd.
Bedford House, 8b Berkeley Gardens
London W8 4AP

RE: Allen Cole vs Universal Music Group, Island Records and Tuff Gong Music
Copyright Infringement

Dear Sir/Madam:

Please be advised that we are the attorneys for Allen Cole. Please direct this letter to your legal counsel immediately and have said legal counsel notify us of such representation.

Our client has requested that we immediately notify you of recently discovered irregularities in the copyright applications on two compositions co-authored by Allen Cole entitled "War" and "Natty Dread" which appear on numerous recordings featuring performances by Bob Marley and the Wailers. The applications claim Mr. Cole's contribution to the compositions as a work for hire and assigned authorship to Tuff Gong Music. Please be advised that Allan Cole never executed any document assigning his rights as co-author of the subject compositions to Tuff Gong Music nor did he ever act in the capacity as employee for hire for Tuff Gong Music. As a result of this erroneous claim by Tuff Gong Music our client has suffered damages resulting from loss of income due him for his contribution as co-author of the subject compositions.

We demand that you cease and desist from any further exploitation of the subject compositions and provide us with an accounting of all income derived from the exploitation of said musical compositions. It is our intention to seek a declaratory judgement to correct the erroneous applications, return our clients his rights as co-author of the subject compositions and recover all loss of income resulting therefrom.

Exhibit "D"

22 November 2016
Page 2

We are making our demand under provisions set out in 17 U.S. Code § 501 protecting our client from the kind of infringing activity that occurred in this matter. In the event you fail to meet this demand, please be advised that Allen Cole has asked us to communicate to you that he will contemplate pursuing all available legal remedies, including seeking monetary damages, injunctive relief and an order that you pay court cost and attorney fees. Prior to initiating said action our client has requested that we offer to open settlement discussions within ten (10) days from the date of this notice. If you or your legal counsel have any questions concerning this matter, please contact us directly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Warren R. Hamilton". The signature is fluid and cursive, with the first name "Warren" being the most prominent part.

Warren R Hamilton

WRH/rs

WARREN R. HAMILTON
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8 February 2017

VIA REGISTRSTERED MAIL
AND EMAIL (THELIONSTEPHAN@AOL.COM)

Tuff Gong Music
Office of Business and Legal Affairs
220 Marcus Garvey Drive
Kingston, Jamaica

RE: Allen Cole vs Blue Mountain Music, Ltd and Tuff Gong Music
Copyright Infringement

Dear Sir/Madam:

Please be advised that we are the attorneys for Allen Cole. Please direct this letter to your legal counsel immediately and have said legal counsel notify us of such representation.

Our client has requested that we immediately notify you of recently discovered irregularities in the copyright applications on two compositions co-authored by Allen Cole entitled "War" and "Natty Dread" which appear on numerous recordings featuring performances by Bob Marley and the Wailers. The applications claim Mr. Cole's contribution to the compositions as a work for hire and assigned authorship to Tuff Gong Music. Please be advised that Allan Cole never executed any document assigning his rights as co-author of the subject compositions to Tuff Gong Music nor did he ever act in the capacity as employee for hire for Tuff Gong Music. As a result of this erroneous claim by Tuff Gong Music our client has suffered damages resulting from loss of income due him for his contribution as co-author of the subject compositions.

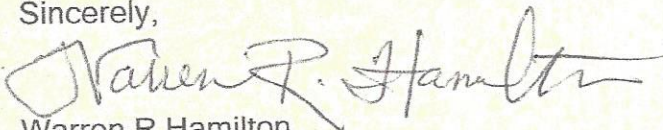
We demand that you cease and desist from any further exploitation of the subject compositions and provide us with an accounting of all income derived from the exploitation of said musical compositions. It is our intention to seek a declaratory judgement to correct the erroneous applications, return our clients his rights as co-author of the subject compositions and recover all loss of income resulting therefrom.

Exhibit "E"

8 February 2017
Page 2

We are making our demand under provisions set out in 17 U.S. Code § 501 protecting our client from the kind of infringing activity that occurred in this matter. In the event you fail to meet this demand, please be advised that Allen Cole has asked us to communicate to you that he will contemplate pursuing all available legal remedies, including seeking monetary damages, injunctive relief and an order that you pay court cost and attorney fees. Prior to initiating said action our client has requested that we offer to open settlement discussions within ten (10) days from the date of this notice. If you or your legal counsel have any questions concerning this matter, please contact us directly.

Sincerely,



Warren R Hamilton

WRH/rs

Russells
SOLICITORS

DATE:

02 December 2016

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WEB: www.russells.co.uk

DX: 37249 Piccadilly 1

OUR REF:

BLU5/3-879458.BKH.km

YOUR REF:

Dear Sir

Re: Allan Cole New York Action

We have been retained by Blue Mountain Music Limited who have passed to us a copy of your letter addressed to them of 22 November in which you made various unparticularised claims and demands upon our clients.

We note in particular the reference in the second paragraph of your letter to “recently discovered irregularities” and we would be pleased if you would kindly provide full details of these bearing in mind that the two compositions to which you refer were registered in the USA in 1974 and 1976.

We look forward to hearing from you but in the meantime must reserve all our client’s rights in this matter.

Yours faithfully,

RUSSELLS

Exhibit “F”